

July 26, 2001

Margie Roman Salas
Office of the Secretary
Federal Communication Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554

Re: CC Docket No. 94-102, Comment sought on E911 Phase II Waiver Request
filed by CORR Wireless Communications, LLC

Dear Secretary Salas;

Telecommunications for the Deaf, Inc. (TDI) strongly opposes any proposed waiver of the Commission's Phase II rules, which would delay the implementation of Phase II service by up to eighteen months, and prevent Public Safety Answering Points from learning the precise location of wireless 911 calls.

TDI is a national advocacy organization actively engaged in representing the interests of the twenty-eight million Americans who are deaf, hard of hearing, late deafened, and deaf-blind. TDI's mission is to promote equal access to media and telecommunications for the aforementioned constituency groups through consumer education and involvement, technical assistance and consulting, application of existing and emerging technologies, networking and collaboration, uniformity of standards, and national policy development and advocacy. Only through equal access will the twenty-eight million Americans who are deaf, hard of hearing, late deafened, and deaf-blind be able to enjoy the opportunities and benefits of the telecommunication revolution to which they are entitled. Furthermore, only by ensuring equal access for all Americans will society benefit from the myriad skills and talents of persons with disabilities.

In 1996, approximately five years ago, the Commission issued the report and order requiring compatibility, and outlined the procedure for setting up compatibility with Enhanced 911 Emergency Calling System for all wireless systems.

CORR Wireless, in its decision to enter the wireless industry, must be aware of all regulations pertaining to accessibility issues. This is of supreme importance, as digital wireless, since its inception more than six years ago, remains inaccessible to deaf and hard of hearing. This inaccessibility is quite glaring, as deaf and hard of hearing people are left behind in the telecommunication revolution.

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CORR Wireless, in its request for a waiver, brings up the defense of market forces being able to provide the best services for the consumers, with its indication of its own proposed plan to meet the compatibility requirements. This is seen as an effort to make such regulations unnecessary, and this defense is not justifiable where it involves the needs of consumers who are deaf and hard of hearing. Those consumers are constantly left behind, and regulations, implemented five years ago, ensure equal access for all Americans. The Commission must, as a result, enforce the requirements and deny the request for a waiver.

For the foregoing reasons, TDI strongly opposes any proposed waiver of the Commission's Phase II rules.

Respectfully submitted,

Claude Stout
Executive Director
Telecommunications for the Deaf, Inc.
8360 Fenton Street
Silver Spring, Maryland 20910-3803
301-589-3786